

WIGDOR LLP

ATTORNEYS AND COUNSELORS AT LAW

85 FIFTH AVENUE
NEW YORK, NY 10003
TEL 212.257.6800
FAX 212.257.6845
WWW.WIGDORLAW.COM

Renan F. Varghese
rvarghese@wigdorlaw.com

December 30, 2020

VIA ECF

The Honorable Ronnie Abrams
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007


Re: Eckhart v. Fox News Network, LLC, et al.; Civ. Case No. 1:20-cv-5593 (RA)

Dear Judge Abrams:

We represent Plaintiff Jennifer Eckhart in the above-referenced matter, and we write to respectfully request the Court's permission to file a 42-page opposition to Defendant Ed Henry's motion to dismiss, motion for sanctions, motion to strike and motion for a more definite statement (the "Henry Motions"). This represents an additional 17 pages for Plaintiff's opposition to the Henry Motions beyond the 25-page limit mandated by Your Honor's Individual Rules of Practice 4(A). Plaintiff also requests the Court's permission to file a 30-page brief in response to the motion to dismiss filed by Defendant Fox News Network, LLC (which represents an additional five pages beyond the 25-page limit mandated by Your Honor's Individual Rules). The additional pages are necessary to allow Plaintiff to respond to all of the arguments and contentions contained in Defendants' moving papers. Mr. Henry has previously sought and received the Court's permission for additional pages for his moving papers. See Dkt. Nos. 121, 122. We have conferred with counsel for both Fox and Mr. Henry, and they have both consented to our request.


We thank Your Honor for the Court's consideration and attention to this matter.

Respectfully submitted,



Renan F. Varghese

Application granted.
SO ORDERED.



Ronnie Abrams, U.S.D.J.
December 31, 2020